PCB REPORT PHASE 3
2007

SISVIL012281

EPA000570

WSP
ENVIRONMENTAL STRATEGIES

750 Holiday Drive, Suite 410 · Pittsburgh, Pennsylvania 15220 · (412) 604-1040 · Fax (412) 920-7455

Memorandum

To: Kelly Bunker, EPA Region 3 PCB Coordinator

From: Tom Biksey, WSP Environmental Strategies

cc: Mike Cote, Chemtura Corporation

Date: August 28, 2007

Re: PCB Characterization - Phase III SB-71
Alternative Sampling Plan
Momentive Performance Materials Inc. Plant, Friendly, West Virginia

Introduction

WSP Environmental Strategies, on behalf of Chemtura Corporation, has prepared an alternative sampling plan to address polychlorinated biphenyls (PCBs) characterization activities in the former Waste Incineration Area (SB-71) at the former Crompton OSi Specialties Group Sistersville facility, located at 3500 South State Route 2 near Friendly, Tyler County, West Virginia. The facility was acquired by General Electric Silicones, LLC (GE), on July 31, 2003, as part of the overall purchase of the OSi business from Chemtura. The facility is now Momentive Performance Materials Inc (MPM), as of December 4, 2006. MPM was created from the sale of General Electric's Advanced Materials business to Apollo Management, L.P., who owns MPM.

During the Phase I and II PCB characterization activities, WSP Environmental Strategies confirmed that soil in the area surrounding SB-71 had PCB concentrations that exceeded the Toxic Substances Control Act (TSCA) self-implementing cleanup level for low occupancy areas of 25 milligrams per kilogram (mg/kg). Because the area of investigation has not had a reported release, and the area being investigated is quite large (greater than 20,000 square feet currently), we believe that the following alternative sampling plan is appropriate to characterize the PCBs in the area surrounding SB-71.

Alternative Sampling Plan

The proposed grid pattern for the SB-71 area is shown on Figure 1, with sampling locations at 25-foot grid intersections and 15-foot grid intersections. Based on the previous sampling results, a 25-foot grid-intersection length is recommended to delineate the potentially affected soil to the west of the Phase II sampling grid. In the northwest area of the Phase II sampling grid, directly north of the sample locations DP-71 and DP-78, a 15-foot grid-intersection length is

recommended to delineate this area due to the close proximity to Sugar Camp Run. In the area to the east of the Phase I sampling grid, the Phase II sampling grid locations were not collected through the concrete slab at the drum flush pad. The proposed grid pattern for the drum flush pad area will be at 25-foot grid intersections. A total of 37 locations will be sampled from the intersection points located by the Phase III sampling grid. The samples closest to SB-71 will be designated as primary sample locations. Samples collected at the edge or corner of the grid will be designated as secondary sample locations. Using the same approach as in the Phase I and Phase II, samples will be collected from each grid point from 0 to 3 inches beneath surface cover or gravel, if present, using direct-push technology. An additional sample from each location will be collected from 3 to 15 inches below the surface sample. At the sampling locations in the drum flush pad, two additional samples will be collected from each location at 15 to 27 inches below the surface and at 27 to 39 inches below the surface sample (based on Geoprobe tube lengths of 4 feet). These samples collected at depth will be designated as secondary samples. The primary samples will be submitted to the laboratory to be analyzed immediately. The secondary samples will be submitted to the laboratory, the initial extraction will be completed, and the samples will be archived pending the results of the primary samples.

The one-foot samples (after the initial 3-inch sample) will be the basis for determining compliance with a cleanup level for PCBs of 25 mg/kg for low occupancy areas. Once the vertical and horizontal delineation has be completed, a smaller grid size may be implemented to further refine the delineated area requiring cleanup using the self-implementing cleanup process.

SISVIL012284

EPA000573